

STATEMENT OF BASIS (AI No. 51784)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0110523 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Industrial Welding Supply, Inc.
107 Buras Dr.
Belle Chasse, LA 70037

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: October 30, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: August 1, 2000
LPDES permit expiration date: July 31, 2005
EPA has not retained enforcement authority.

C. Date Application Received: October 26, 2009

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - welding supply facility**

Industrial Welding Supply is an existing facility which operates as a retail distributor of welding supplies and associated products. The company provides products, accessories, parts, servicing, and rentals. Products include welding equipment, welding gases, small powered tools, safety supplies and related hardware items. No manufacturing or fabrication is performed at the facility.

Based on the facility activities and wastestreams, this facility could qualify for a Class I Sanitary General Permit. However, based on compliance history, an individual permit is being issued in order to increase monitoring frequency from the general permit.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 5084 and 5169

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C. LOCATION - 107 Buras Dr. in Belle Chasse, Plaquemines Parish
Latitude 29°50'03", Longitude 90°03'27"

3. OUTFALL INFORMATION

Outfall 001 has been deleted.

Outfall 002 has been deleted.

Outfall 102

Discharge Type: treated sanitary wastewater

Treatment: package treatment plant with chlorination

Location: at the point of discharge from the sanitary treatment system

Flow: 1,000 gpd

Discharge Route: unnamed drainage canal, thence into Bayou Barataria

4. RECEIVING WATERS

STREAM - unnamed drainage canal, thence into Bayou Barataria

BASIN AND SEGMENT - The discharge is into an unnamed ditch, which is physically located in subsegment 020601 of the Barataria Basin, defined at LAC 33:IX.1123.Table 3 as Intracoastal Waterway -From Bayou Villars to Mississippi River (Estuarine). However, the discharge from Industrial Welding Supply, Inc. does not flow into these defined waterbodies, rather into subsegment 020802, defined at LAC 33:IX.1123.Table 3 as Bayou Barataria and Barataria Waterway-From ICWW to Bayou Rigolettes (Estuarine). Therefore, for the purposes of issuing this permit, subsegment 020802 will be used in the development of requirements.

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 020802, Bayou Barataria and Barataria Waterway-From ICWW to Bayou Rigolettes (Estuarine), is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. CHANGES FROM PREVIOUS PERMIT

Outfall 001 was previously permitted as a stormwater outfall. Outfall 002 was previously permitted as a stormwater, exterior vehicle washwater and previously monitored sanitary wastewater outfall. The exterior vehicle

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wastewater has been eliminated. Stormwater coverage is not required based on the designated SIC codes (See #13 on page 4). Therefore, Outfalls 001 and 002 have been deleted, and Stormwater Pollution Prevention Plan requirements have been removed from the permit. Outfall 102 is no longer an internal outfall, but will retain the 102 designation for consistency.

Monthly Average Limitations have been added to Outfall 102. Weekly Average Limitations for Outfall 102 have been changed to Daily Maximum Limitations.

pH has been added to Outfall 102.

Monitoring Frequency of Outfall 102 has been increased from 1/6 months to quarterly.

The subsegment has been changed from 020601 to 020802 (See #4 on page 2).

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

Warning Letter WE-L-09-0186 was issued September 9, 2009.

B. DMR Review/Excursions - No DMRs have been submitted since September 2004.

8. EXISTING EFFLUENT LIMITS

Outfall 001		Outfall 002	
TOC	—:50 mg/l	COD	—:125 mg/l
Oil & Grease	—:15 mg/l	Oil & Grease	—:15 mg/l
pH	6-9 s.u.	Soaps & Detergents	Record
		pH	6-9 s.u.
Outfall 102			
BOD	—:45 mg/l		
TSS	—:45 mg/l		
Fecal Coliform	—:400 colonies/ml		

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020801 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES

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permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

An SWP3 is not required by the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC codes 5084 or 5169 are not considered to have stormwater discharges associated with industrial activity.

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Rationale for Industrial Welding Supply, Inc.

1. Outfall 102 treated sanitary wastewater (estimated flow is 1,000 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	LAC33.IX.2707.I.1.b
BOD ₅	30:45	See limits justification (1),(2) below
TSS	30:45	See limits justification (1),(2) below
Fecal Coliform	200:400	See limits justification (1),(2) below
pH (s.u.)	6.0:9.0 (min:max)	See limits justification (2) below

Treatment: package treatment plant with chlorination

Monitoring Frequency: quarterly - The monitoring frequency has been increased based on compliance history.

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2363.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit, and the previous permit.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.